

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 3:CR-14- 306  
:   
v. : (JUDGE )  
:   
MICHAEL TURNER, : (ELECTRONICALLY FILED)  
ANDREW TURNER, :   
JASON MITCHELL :   
Defendants :

INDICTMENT

THE GRAND JURY CHARGES:

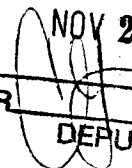
COUNT 1

(Title 18, U.S.C., § 371 - Conspiracy)

Beginning in or about June 1, 2014 and continuing through June 30, 2014, in the Middle District of Pennsylvania, and elsewhere, the defendants,

**MICHAEL TURNER,  
ANDREW TURNER, and  
JASON MITCHELL**

knowingly and willfully conspired and agreed together and with others, whose identity is both known and unknown, to commit a crime against the United States, to wit, violations of Title 18 United States Code, Sections 472 and 473.

FILED  
SCRANTON  
NOV 25 2014  
PER   
DEPUTY CLERK

### **MANNER AND MEANS**

1. It was part of the conspiracy that the conspirators obtained and received counterfeit Federal Reserve Notes in denominations of \$100.

2. It was part of the conspiracy that the conspirators passed the counterfeit Federal Reserve Notes at gambling casinos and other retailers within the Middles District of Pennsylvania.

### **OVERT ACTS**

In furtherance of the conspiracy, and to attain the objects of the conspiracy, the conspirators committed the following overt acts, among others:

a. On or about June 22, 2014 into June 23, 2014, the conspirators travelled to the Mount Airy Casino in Mount Pocono, Pennsylvania and passed several \$100 counterfeit Federal Reserve Notes.

b. On or about June 27, 2014, the conspirators travelled together to the Mohegan Sun Casino in Plains, Pennsylvania and passed several \$100 counterfeit Federal Reserve Notes.

In violation of Title 18 United States Code, Section 371.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2**

(Title 18, U.S.C., §§ 472 and 2 – Uttering Counterfeit Obligations,  
Aiding and Abetting)

Beginning in or about June 1, 2014 and continuing through June 30, 2014, in the Middle District of Pennsylvania, and elsewhere, the defendants,

**MICHAEL TURNER,  
ANDREW TURNER, and  
JASON MITCHELL**

aiding and abetting one another and aided and abetted by one another, with intent to defraud, did pass counterfeit Federal Reserve Notes, to wit: the defendants passed counterfeit \$100 Federal Reserve Notes in the amount of \$8,600 at the Mount Airy Casino, Mount Pocono, Pennsylvania and at the Mohegan Sun Casino in Plains, Pennsylvania at various gaming tables while playing various games including blackjack and roulette.

In violation of Title 18, United States Code, Sections 472 and 2.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 3**

(Title 18, U.S.C., §§ 473 and 2 – Dealing in Counterfeit Obligations,  
Aiding and Abetting)

Beginning in or about June 1, 2014 and continuing through June 30, 2014, in the Middle District of Pennsylvania, and elsewhere, the defendants,

**MICHAEL TURNER,  
ANDREW TURNER, and  
JASON MITCHELL**

aiding and abetting one another and aided and abetted by one another, with intent to defraud, did knowingly exchange, transfer, receive, and deliver, counterfeit Federal Reserve Notes, to wit: the defendants exchanged, transferred, received, and delivered counterfeit \$100 Federal Reserve Notes in the amount of \$8,600 at the Mount Airy Casino, Mount Pocono, Pennsylvania and at the Mohegan Sun Casino in Plains, Pennsylvania at various gaming tables while playing various games including blackjack and roulette.

In violation of Title 18, United States Code, Sections 473 and 2.

A TRUE BILL

11-25-14

Date

Nov. 25, 2014

Date

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Peter J. Smith  
PETER J. SMITH *MLD*  
United States Attorney